Docket # 98-4124 Number 1

41958

Dear NHTSA

NHTSA-98-4124-42

This letter is a response to NHTSA Document 98-4124 concerning the reduction of DRL intensity. it is a small step in the right direction, however it is way too little and way too late. By the time it is fully in effect, no sooner than August 7, 2003, there will be several millions more GM and other brand vehicles with DRL systems that 93-4324 currently judges to present giare probiems.

I have obtained the full text of 98-4124. It is very disappointing for the following foui ieasons.

1. It does not demand an end to the manufacture of future DRLs and recalling and disabling of the current ones on the road.

2. 98-4124 does not even question the basic ridiculous premise of DRLs. Do I really need a glaring set of headiights to notice semi truck , bus, or any other vehicle in broad day light? If I do, I strongly feel that I am not qualified to be driving, and deserve to be hit by the truck! I have never failed to see a vehicle by daylight in thirty years of driving.

There is an additional basic flaw in this supposed need to make vehicles more conspicuous. If vehicles should be glaringly conspicuous, they should be so from all angles. DRLs are thus only a 25% solution. They can only be seen within a limited range of angles from the front. The vehicle's sides and rear are still not more conspicuous !

3. While 98-4124 does concede that current DRLs cause glare, and has proposed a plan to heip remedy this fact with future DRL systems, there is no proposal to remedy the DRL systems currently on the road. It does in fact permit more such systems to be manufactured in the future.

4. In many places 98-4124 talks about the many obvious benefits of the "turn signal" type of DRL, yet it does not simply mandate them. This is the only type of DRL I personally consider tolerable.

5. The cost consciousness of 98-4124 to the various DRLs methods is very objectionable. If the DRL concept is worth doing, it is worth doing well. This is especially true since DRLs are voluntary, not mandated. It is incredible that the likes of Saturn (especially the new coupe) are even allowed on the road with their series wired high beams, considering that 98-4124 says that they exceed the 7000 cd level in real world service. NHTSA has no problem mandating $1000 to $1500 for air bags.

Why is ten or even twenty more dollars for a proper DRL unacceptable? What is truly unexcusable and unacceptable is allowing production a poorly executed DRL system for the sake of saving at the very most, (assuming $20 on a $10000 car) two tenths of a percent of the price of a new car.

I have many objections to DRLs. . . .

I. Rearview mirror use. There are enough DRL vehicles on the road that I now simply leave my outside rearview mirrors adjusted low to avoid continuous glare from DRL vehicles positioned in the blind spots those mirrors cover. They are adjusted to provide a view of the pavement along side my car. This works just fine at night because I can see the light from a car in my blind spots on the pavement. In the daytime, however, to use these mirrors I must reposition my head down and over about a foot in order to peer into them. This causes me to take my sight away from directly ahead for precious split seconds. It also causes me not to use the mirrors until I need to, thus I do not monitor developing situations in my mirrors.

Since the proposed 98-4124 is going affect only DRLs produced a few years into the future, it looks like my new rear view mirror habits are here to stay. I long for the good old days when I could my mirrors continuously with quick convenient darts of the eyes.

My inside mirror is adjusted permanently to the night position, and I have installed a layer of dark window tint to it as well.

This mirror issue is exacerbated by the huge number of light trucks and SUVs (especially the current S-l 0/Blazer) that populate the roads here in Colorado, with their high mounted headlights shining directly into my car and my face at eye level.

2. Glare effects on my vision, and conscious visual discomfort avoidance. A friend of mine recently got a Canon Rebel G camera. It has a tiny halogen light on the front that shines directly into the eyes of subjects just before they have a flash picture taken of them. This feature causes the subjects' pupils to contract and thus minimize the "red eye effect" wherein the subject's retinas reflect a red color back at the camera.

DRLs have the same effect. Even by full daylight at times, but especially during lower light non-night situations my eyes could and would adjust to the natural light levels. The pupils could get bigger, and the retinas could develop greater sensitivity. However with DRLs shining into my eyes (and increasingly these days, other drivers more likely to join in with their night systems) this natural adjustment of my eyes is impossible.

Two lane roads are a problem because the proximity to the oncoming traffic places my eyes almost directly into the most intensely directional part of an oncoming headlamp's beam. I genuinely cannot make out any details ahead in my lane on a two lane road when staring into an oncoming set (or sets) of DRLs. At a distance of about one quarter of a mile or more, DRLs mask bicyclists, road hazards and even vehicles in my lane. As a result, here is another old habit i am unlearning. I was trained (and like) to look as far ahead down the road as possible. With oncoming DRLs I look away to the right, and down to the pavement . I limit my field of vision strictly to my

lane, and no more than two hundred feet ahead. Thus I lower the visual discomfort, and reaiiy don't iose any visuai abilities ahead that i haven't already lost to DRL giare anyway.

This leads to another habit I am unlearning. I much prefer to stare intently and directiy at oncoming vehicles on two lane roads. This is important because a head on collision is often a matter of just a few feet. With an oncoming DRL vehicle, I look away as described above, stay strictly in my own lane, and watch for the pavement ahead in my lane to be occluded by the oncoming vehicle ii if does stray across the line into my lane. I know this is potentially more risky, but it is calculated. Vehicles straying across the iine is rare enough that i consider it an acceptabie risk. However, my notice of such vehicles in my lanes is going to be far shorter, and I will have less options and less time to deal with the situation. However, I definitely do suffer visual discomfort staring directiy into an iiiuminated headiight and avoid doing so! Am i the only human being around who feels discomfort looking directly into an illuminated headlight?

Driving is a visuai activity. i sirongiy, and in no uncertain terms desire to iook all around and alertly make continuous assessments of situations occurring around me. The one place i want to be most attentive to at aii times whiie driving is the road directly ahead of me. It is absolutely unbelievable and quite honestly, extremely frustrating to me that NHTSA is allowing, and even encouraging the placement of uncomfortable sources of giare in my eyes from exactly this center of visuai attention of all driving, the view of the road ahead. This is the height of stupidity and absurdity!

The result of DRLs on the road for me is the glare blinding impairment of, and the conscious iimiiing of my visuai assessment of traffic situations to avoid the discomfort of looking into illuminated headlights. My attention is increasingly being iimited to the pavement directiy in front of my car, and no where else. I am abandoning the big picture for limted tunnel vision. My day driving vision is becoming as limited as night vision. At night I am looking at my headlight illumination area to see the road and avoid glare. By day i am iimited to this same area to avaid DRL giare. Being an extremely attentive driver, I hate doing this.

3. DRLs at night. I have witnessed four GM DRL vehicles in the last year driving at night with their DRLs on. One was in a parking lot, the second was on a well lighted street, the third was on I-70 at night, and the fourth was a close call. I was driving on a curvy mountain road at night hear my home. I came around a blind curve at the speed iimit and ended up within ten feet of the rear end of a GMC Suburban driving with DRLs. I did not see him until my headlights lit up his rear taillight reflectors! He was going 15 mph beiow a 30 MPH iimit. i had to brake very hard. Afterwards i feit anger towards GM and NHTSA for allowing DRLs in the first place.

4. DRLs presence on the road encourages other copycat drivers to turn on their often (though not aiwaysj even more giaring night headiights.

Lastly, if NHTSA is irrevocably committed to DRLs as it appears to be, then I want to strongly and in no uncertain terms demand that the turn signai type of DRL be mandated as quickly as possible for the following reasons.

A. They are not headlights with a directional hot spot of glare aimed right at opposing traffic.
B. They are a distinctive and easier on the eyes amber color.
C. They can be purpose built to be a DRL with a wide angle pattern that make the vehicle more visible form angles other than head on.
D. They are inherently unable to be driven by night, forcing drivers to turn on their night lighting systems.
E. Their light can be made to be softer and more diffuse, and thus less discomforting.
F. They are not headlights, therefore they do not encourage copycat drivers to turn on their night lighting systems.
G. See the text of 98-4124 for even more positive aspects of turn signal DRLs.

In summary, the DRL concept is logically flawed, and questionable. Furthermore DRLs are unproven, and I hear there is some initial statistical doubt as to their effectiveness. Current DRLs systems are poorly thought out, makeshift in their execution, overbearing in their functioning, and cheaply done. They can and must be engineered correctly! Let me be succinct and to the point concerning my heartfelt, sincere and strong feelings about what NHTSA needs to do concerning DRLs.

A. RECALL AND DISCONNECT ALL DRLs, and outlaw all hard wired systems in the future. I strongiy desire to use my mirrors and forward vision more effectively than what DRLs currently allow me to do.

If not this step, then-

B. Revise 98-4212 to MANDATE THE AMBER TURN SIGNAL STYLE OF DRL.
C. DEVELOP SOME PLAN FOR CURRENT DRL SYSTEMS to decrease their brightness or disconnect them.

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